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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|---------------------------------------|
| |) | |
| In re: |) | Chapter 11 |
| |) | |
| ENDO INTERNATIONAL plc, et al., |) | Case No. 22–22549 (JLG) |
| |) | |
| Debtors.¹ |) | (Joint Administration Pending) |
| |) | |

**VERIFIED STATEMENT OF THE AD HOC CROSS–HOLDER GROUP PURSUANT
TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the ad hoc group (the “Ad Hoc Cross–Holder Group”) of certain unaffiliated holders of loans, notes, or other indebtedness issued under (i) that certain Credit Agreement, dated as of April 27, 2017 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, including, without limitation, by that certain Amendment and Restatement Agreement, dated as of March 25, 2021, the “Credit Agreement”), by and among Endo International plc, Endo Luxembourg Finance Company I S.à

¹ The last four digits of Debtor Endo International plc’s tax identification number are 3755. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Endo>. The location of the Debtors’ service address for purposes of these chapter 11 cases is: 1400 Atwater Drive, Malvern, PA 19355.

r.l. ("Lux Borrower"), and Endo LLC, as borrowers, JPMorgan Chase Bank, N.A., as administrative agent, and the lenders party thereto from time to time (the commitments, loans, and other obligations incurred thereunder, the "Credit Agreement Obligations"); (b) that certain Indenture, dated as of March 25, 2021 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the "6.125% Notes Indenture"), by and among Lux Borrower and Endo U.S. Inc., as issuers, Computershare Trust Company, National Association ("Computershare"), as trustee, and the guarantors party thereto (the obligations incurred thereunder, the "6.125% Notes Obligations"); (c) that certain Indenture, dated March 28, 2019 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the "7.500% Indenture"), by and among Par Pharmaceuticals, Inc., as issuer, Computershare, as trustee, and the guarantors party thereto (the obligations incurred thereunder, the "7.500% Notes Obligations"); (d) that certain Indenture, dated as of April 27, 2017 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the "5.875% Notes Indenture"), by and among Endo Designated Activity Company ("Endo DAC"), Endo Finance LLC ("Endo Finance") and Endo Finco Inc. ("Endo Finco"), as issuers, Computershare, as trustee, and the guarantors party thereto (the obligations incurred thereunder, the "5.875% Notes Obligations" and, collectively with the Credit Agreement Obligations, the 6.125% Notes Obligations, and the 7.500% Notes Obligations, the "First Lien Obligations"); (e) that certain Indenture, dated as of June 16, 2020 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the "Second Lien Notes Indenture"), by and among Endo DAC, Endo Finance, and Endo Finco, as issuers, Wilmington Savings Fund Society, FSB, as trustee, and the guarantors party thereto (the obligations incurred thereunder, the "Second Lien Obligations" and, together with the First Lien Obligations, the "Secured

Obligations”); (f) that certain Indenture, dated as of January 27, 2015 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the “2025 6.000% Notes Indenture”), by and among Endo DAC, Endo Finance, and Endo Finco, as issuers, UMB Bank, National Association (“UMB Bank”), as trustee, and the guarantors party thereto (the obligations incurred thereunder, the “2025 6.000% Obligations”); (g) that certain Indenture, dated as of July 9, 2015 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the “2023 6.000% Notes Indenture”), by and among Endo DAC, Endo Finance, and Endo Finco, as issuers, UMB Bank, as trustee, and the guarantors party thereto (the obligations incurred thereunder, the “2023 6.000% Obligations”); and (h) that certain Indenture, dated as of June 16, 2020 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, the “2028 6.000% Notes Indenture”), by and among Endo DAC, Endo Finance, and Endo Finco, as issuers, U.S. Bank Trust Company, National Association (“U.S. Bank”), as trustee, and the guarantors party thereto (the obligations incurred thereunder, the “2028 6.000% Obligations” and, collectively with the 2025 6.000% Obligations and the 2023 6.000% Obligations, the “Unsecured Obligations”; the Unsecured Obligations together with the Secured Obligations, the “Obligations”) hereby submits this verified statement (this “Statement”) and in support thereof state as follows:²

1. In April 2021, certain members of the Ad Hoc Cross-Holder Group retained Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”) to represent them in connection with a potential restructuring involving the above-captioned debtors and debtors-in-possession (the “Debtors”). From time to time thereafter, certain additional holders of Obligations joined the Ad Hoc Cross-Holder Group.

² Each member of the Ad Hoc Cross-Holder Group files this Statement exclusively on its own behalf and does not assume any fiduciary or other duties to any other member or to any other entity or individual.

2. The members of the Ad Hoc Cross–Holder Group are either the beneficial holders of, or the investment advisors or managers to, funds and/or accounts that hold disclosable economic interests in relation to the Debtors. In accordance with Bankruptcy Rule 2019, and based upon information provided to Paul, Weiss by each member of the Ad Hoc Cross–Holder Group, attached hereto as **Exhibit A** is a list of the names, addresses, and nature and amount of each disclosable economic interest of each present member of the Ad Hoc Cross–Holder Group as of August 11, 2022.³

3. Nothing contained in this Statement (or **Exhibit A** hereto) is intended to or should be construed to constitute (a) a waiver or release of any claims filed or to be filed against the Debtors held by any member of the Ad Hoc Cross–Holder Group, its affiliates, or any other entity, or (b) an admission with respect to any fact or legal theory. Nothing herein should be construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Cross–Holder Group to assert, file, and/or amend any proof of claim in accordance with applicable law and any orders entered in these cases.

4. Paul, Weiss reserves the right to amend or supplement this Statement as necessary in accordance with Bankruptcy Rule 2019.

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³ Individuals associated with members of the Ad Hoc Cross–Holder Group may own claims against or interests in the Debtors in their individual capacities, but Paul, Weiss does not represent such individuals in such capacities.

Dated: August 18, 2022
New York, New York

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Andrew N. Rosenberg

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Attorneys for the Ad Hoc Cross-Holder Group

EXHIBIT A

Disclosable Economic Interests of the Members of the Ad Hoc Cross-Holder Group¹

| Name of Creditor ² | Address | Revolving Credit Facility Obligations ³ | Term Loan Obligations ⁴ | 6.125% Notes Obligations | 7.500% Notes Obligations | 5.875% Notes Obligations | 2L Notes Obligations | 2025 6.000% Obligations | 2023 6.000% Obligations | 2028 6.000% Obligations | Common Stock |
|--|--|--|------------------------------------|--------------------------|--------------------------|---------------------------|----------------------|-------------------------|-------------------------|-------------------------|--------------|
| American International Group | 28 Liberty St., 47th Floor New York, NY 10005 | \$ — | \$ — | \$ 4,964,000 | \$ 21,348,000 | \$ — | \$ 17,687,000 | \$ — | \$ — | \$ — | — |
| Bank of America, N.A., solely in respect of its U.S. Distressed & Special Situations Group | 900 W Trade St., NC1-026-05-41 Charlotte, NC, 28255 | \$ — | \$ 23,281,854.58 | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | — |
| BofA Securities, Inc., solely in respect of its U.S. Distressed & Special Situations Group | | \$ — | \$ — | \$ 5,253,000 | \$ 1,137,000 | \$ (1,069,000) (short) | \$ 23,840,000 | \$ — | \$ — | \$112,922,000 | — |
| Banc of America Credit Products, Inc., solely in respect of its U.S. Distressed & Special Situations Group | | \$ 30,000,000 | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | — |

¹ To the best of Paul, Weiss’s knowledge, the information included herein is accurate as of August 11, 2022. The amounts set forth herein include only outstanding principal and do not include any claims for, without limitation, fees, expenses, accrued and unpaid interest, premiums, make-wholes, or indemnification that may be owing under any applicable credit agreement, indenture or other instrument, agreement or document. To the extent applicable, the amounts set forth herein do not include disclosable economic interests that are subject to pending trades or other transfers that have not settled or otherwise been closed as of August 11, 2022.

² Each entity on this **Exhibit A** holds disclosable economic interests, or acts as investment advisor or manager to funds and/or accounts or their respective subsidiaries that hold disclosable economic interests in relation to the Debtors.

³ “**Revolving Credit Facility Obligations**” means those loans and other obligations relating to the revolving credit facility incurred under the Credit Agreement.

⁴ “**Term Loan Obligations**” means those loans and other obligations incurred in connection with the Credit Agreement.

| Name of Creditor ² | Address | Revolving Credit Facility Obligations ³ | Term Loan Obligations ⁴ | 6.125% Notes Obligations | 7.500% Notes Obligations | 5.875% Notes Obligations | 2L Notes Obligations | 2025 6.000% Obligations | 2023 6.000% Obligations | 2028 6.000% Obligations | Common Stock |
|---|--|--|------------------------------------|--------------------------|--------------------------|--------------------------|----------------------|-------------------------|-------------------------|-------------------------|----------------|
| Brigade Capital Management, LP | 399 Park Avenue, 16th Floor New York, NY 10022 | \$ — | \$ 14,673,520.35 | \$ 13,845,000 | \$27,497,000 | \$ 6,090,000 | \$ 45,404,000 | \$ — | \$ — | \$ 44,125,000 | — |
| Canyon Capital Advisors LLC, on behalf of its managed funds and accounts | 2728 N. Harwood Street, 2 nd Floor Dallas, TX 75201 | \$ 38,000,000 | \$ 86,536,471.14 | \$ 92,500,000 | \$37,797,000 | \$ — | \$162,545,000 | \$ — | \$ — | \$ 99,851,000 | — |
| Capital Research and Management Company | 333 South Hope St., 55 th Floor Los Angeles, CA 90071 | \$ — | \$ — | \$ 23,340,000 | \$170,426,000 | \$ 11,744,000 | \$ 6,560,000 | \$ — | \$ — | \$ 60,506,000 | — |
| Citadel Equity Fund Ltd. | The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801 | \$ — | \$ — | \$ 10,000,000 | \$ 10,000,000 | \$ — | \$110,000,000 | \$ — | \$ — | \$ — | 640,541 shares |
| Deutsche Bank Securities Inc. (solely with respect to the Distressed Products Group) | One Columbus Circle, 7th Floor New York, NY 10019 | \$ — | \$ 12,902,000 | \$ (3,843,000) (short) | \$ (1,000,000) (short) | \$ 2,422,000 | \$ 2,794,000 | \$ — | \$ — | \$ 15,506,000 | — |
| Franklin Advisers Inc., as investment manager on behalf of certain funds and accounts | 1 Franklin Pkwy. San Mateo, CA 94403 | \$ — | \$ — | \$ 72,980,000 | \$222,294,000 | \$ 62,516,000 | \$120,757,000 | \$ — | \$ — | \$ 6,393,000 | — |
| Certain funds and/or accounts advised or managed by Glenview Capital Management, LLC | 767 Fifth Avenue, 44 th Floor New York, NY 10153 | \$ — | \$ — | \$ 41,186,000 | \$ 8,000,000 | \$ — | \$ 10,977,000 | \$ — | \$ — | \$ 75,927,000 | — |
| Invictus Global Management, LLC | 310 Comal Street, Building A, Suite 229 Austin, Texas 78702 | \$ — | \$ 5,000,000 | \$ — | \$ — | \$ — | \$ 8,000,000 | \$ 135,000 | \$ — | \$ 12,500,000 | — |
| J.P. Morgan Investment Management Inc. | 1 East Ohio Street, 6th Floor Indianapolis, IN 46204 | \$ — | \$ 3,806,339.40 | \$ 32,915,000 | \$105,032,000 | \$ 13,957,000 | \$ 33,180,000 | \$ — | \$ — | \$ 22,977,000 | — |
| Marathon Asset Management LP, on behalf of certain funds and accounts | One Bryant Park, 38th Floor New York, NY 10036 | \$ — | \$ 86,381,928 | \$ 87,514,000 | \$ 54,979,000 | \$ — | \$ 55,400,000 | \$ — | \$ — | \$133,041,000 | — |

| Name of Creditor ² | Address | Revolving Credit Facility Obligations ³ | Term Loan Obligations ⁴ | 6.125% Notes Obligations | 7.500% Notes Obligations | 5.875% Notes Obligations | 2L Notes Obligations | 2025 6.000% Obligations | 2023 6.000% Obligations | 2028 6.000% Obligations | Common Stock |
|--|--|--|------------------------------------|--------------------------|--------------------------|--------------------------|----------------------|-------------------------|-------------------------|-------------------------|-----------------------|
| Nomura Corporate Research and Asset Management | 309 W 49 th St. 9 th Floor New York, NY 10019 | \$ — | \$ — | \$ 20,568,000 | \$ 39,642,000 | \$ 1,250,000 | \$ 32,829,000 | \$ 2,000 | — | \$ 35,820,000 | — |
| Oaktree Capital Management, L.P., solely as Investment Manager on behalf of certain funds and accounts within its USSS and OPPS Strategies | 333 South Grand Ave, 28th Floor Los Angeles, CA 90071 | \$ — | \$ 92,669,214 | \$ — | \$ 23,000,000 | \$ — | \$ 81,585,000 | \$ — | \$ — | \$108,489,000 | — |
| Two Seas Global (Master) Fund LP | 32 Elm Place Rye, NY 10580 | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | \$ — | \$ 23,000,000 | — |
| Western Asset Management Company, LLC | 385 East Colorado Boulevard Pasadena, CA 91101 | \$ — | \$ — | \$ 550,000 | \$ 38,470,000 | \$ — | \$ — | \$ — | \$ — | \$ — | — |
| Whitebox Advisors LLC | 3033 Excelsior Blvd., Suite 500 Minneapolis, MN 55416 | \$ — | \$ 3,465,250 | \$ 9,000,000 | \$ 24,739,000 | \$ — | \$ — | \$ — | \$ 1,000,000 | \$ 10,000,000 | — |
| TOTAL | | \$68,000,000 | \$328,716,577.47 | \$410,772,000 | 783,361,000 | \$ 96,910,000 | \$711,558,000 | \$ 137,000 | \$ 1,000,000 | \$761,057,000 | 640,541 Shares |